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Attorneys for Plaintiffs
Emma C., et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

EMMA C., *et al.*,

Plaintiffs,

v.

TONY THURMOND, *et al.*,

Defendants.

Case No.: 3:96-cv-4179 (VC)

**PLAINTIFFS' STATEMENT OF
NON-OPPOSITION TO STATE'S
MOTION TO TERMINATE THE
FIRST AMENDED CONSENT
DECREE PURSUANT TO SECTIONS
13.0 AND 18.10 OF THE DECREE**

Date: December 12, 2024

Time: 2:00 p.m.

Courtroom: 4

Before: Hon. Vince Chhabria

Plaintiffs Emma C., *et al.*, do not oppose the motion of Defendants California Department of Education, Tony Thurmond, in his official capacity as the State Superintendent of Public Instruction, and the State Board of Education (collectively, “State Defendants”) to terminate the First Amended Consent Decree (Dkt. 832) pursuant to Sections 13.0 and 18.10 of the First Amended Consent Decree. Plaintiffs contend that the Court need not address the State Defendants’ request to terminate the First Amended Consent Decree pursuant to Fed. R. Civ. Proc. 60(b).

Dated: November 21, 2024

Respectfully submitted,

YOUTH AND EDUCATION LAW PROJECT
STANFORD LAW SCHOOL
MILLS LEGAL CLINIC

BY: /s/ William S. Koski
William S. Koski
Attorneys for Plaintiffs Emma C., et al.

NATIONAL CENTER FOR YOUTH LAW

BY: /s/ Freya Pitts
Freya Pitts
Attorneys for Plaintiffs Emma C., et al.

CERTIFICATE OF SERVICE / ECF ATTESTATION

I hereby certify that on the date set forth below, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**PLAINTIFFS' STATEMENT OF NON-OPPOSITION TO STATE'S MOTION TO
TERMINATE THE FIRST AMENDED CONSENT DECREE PURSUANT TO
SECTIONS 13.0 AND 18.10 OF THE DECREE**

I further certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct.

Executed on November 21, 2024, at Stanford, California.

/s/ William S. Koski

William S. Koski